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*Via ECF and
Courtesy Copy by Facsimile*

October 31, 2016

The Honorable Paul G. Gardephe
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: ***United States v. Tuzman, 15 Cr. 536 (PGG)***

Dear Judge Gardephe:

We represent Omar Amanat in the above-referenced action. We are writing to respectfully request a modification to Mr. Amanat's conditions of bail in connection with the care of his five-year old son, D.A., who recently suffered a brain injury. After undergoing surgery, D.A. thankfully was released from the hospital and is now recovering at his mother's home in Verona, New Jersey. D.A. will undergo a regimen of rehabilitation at the Kessler Institute for Rehabilitation in West Orange, New Jersey. We also understand that because Mr. Amanat's son is subject to potential seizures and otherwise needs constant assistance, a full-time home health aide attends to D.A. while he is at home recovering.

Accordingly, on consent of the government and Pretrial Services, we request that for the period that D.A. is under rehabilitation, the Court modify Mr. Amanat's conditions of release to enable him to: (i) visit D.A. at his home in Verona, New Jersey; and (ii) take D.A. to, and accompany D.A. during rehabilitation treatments at the Kessler Institute, provided that 24 hours before any visit or rehabilitation appointment, Mr. Amanat must first contact and obtain consent from Pretrial Services and provide Pretrial Services with an explanation of the reasons for his travel, where he will be traveling, how he will be traveling, and the estimated times of his travel.

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We thank the Court for its consideration in this matter.

Respectfully Submitted,

/s/ Melissa Madrigal
Melissa Madrigal

cc: Joshua Rothman, Vincent Imbrosciano, U.S. Pretrial Services Officers (by email)
AUSAs Andrea Griswold and Damian Williams (by ECF and email)